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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THEIR MOTION TO
COMPEL RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

I, Michelle Yang, declare as follows:

1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Defendants' Administrative Motion to File Under Seal Exhibits to their Motion to Compel Responses to Interrogatories and Production of Documents.

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Exhibit 1A	Entire Document	Plaintiff
Exhibit 3	Entire Document	Plaintiff
Exhibit 6	Entire Document	Plaintiff
Exhibit 15	Entire Document	Defendants
Exhibit 18	Entire Document	Plaintiff
Exhibit 21	Highlighted Portions	Plaintiff

3. Exhibit 1A is Uber's First Set of Requests for Production, and Exhibit 3 is Waymo's Responses to these Requests for Production. I understand that the highlighted portions of Exhibit 1 contain technical information designated by Waymo as either confidential or highly confidential. Exhibit 3 was designated by Waymo as "Highly Confidential – Attorneys' Eyes Only" by Waymo under the Protective Order.

4. Exhibit 6 is Waymo's Responses to Uber's First set of Interrogatories, which was likewise designated "Highly Confidential – Attorneys' Eyes Only" by Waymo under the Protective Order.

5. Exhibit 15 is a email from Quinn Emanuel to the Uber legal team. This email includes the email addresses of certain high-ranking company executives. Defendants seek to seal this information in order to protect the privacy of these executives, as they are prominent

1 individuals at a company that is currently the subject of extensive media coverage. Disclosure of
2 this information for these high-ranking executives could expose them to harm or harassment.

3 6. Exhibit 18 is an internal Google presentation regarding competition. This
4 presentation has been designated as “Highly Confidential – Attorneys’ Eyes Only” by Waymo.

5 7. Exhibit 21 is Waymo’s Third Set of Requests for Production to Uber. The
6 highlighted portions of Exhibit 21 have been designated as “Highly Confidential – Attorneys’
7 Eyes Only” by Waymo.

8 8. Defendants’ request to seal is narrowly tailored to the specific exhibits attached to
9 Defendants’ Motion to Compel that merit sealing.

10 I declare under penalty of perjury that the foregoing is true and correct. Executed this 21st
11 day of June, 2017 at Washington, D.C.

12
13 /s/ Michelle Yang

Michelle Yang

14
15
16 **ATTESTATION OF E-FILED SIGNATURE**

17 I, Arturo J. González, am the ECF User whose ID and password are being used to file this
18 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
19 concurred in this filing.

20 Dated: June 21, 2017

/s/ Arturo J. González

Arturo J. González